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12 *PROF-2013-S3 Legal Title Trust,*
13 *by U.S. Bank National Association,*
14 *as Legal Title Trustee*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 PROF-2013-S3 LEGAL TITLE TRUST, BY
13 U.S. BANK NATIONAL ASSOCIATION, AS
14 LEGAL TITLE TRUSTEE

15 Plaintiff,

16 vs.

17 FLYING FROG AVENUE TRUST, a Nevada
18 Limited Liability Company, VENEZIA
19 COMMUNITY ASSOCIATION, RED ROCK
20 FINANCIAL SERVICES, LLC, DOE
21 Individual I-X inclusive; and ROE Business
22 Entities XI-XX inclusive;

23 Defendants.

Case No.: 2:17-cv-01933-JCM-GWF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
DEFENDANT RED ROCK FINANCIAL
SERVICES, LLC'S MOTION TO
DISMISS [ECF NO. 19] and
DEFENDANT FLYING FROG AVENUE
TRUST'S MOTION TO DISMISS [ECF
NO. 21]**

23 COMES NOW, Plaintiff, PROF-2013-S3 Legal Title Trust, by U.S. Bank National
24 Association, as Legal Title Trustee (hereinafter "Plaintiff" or "U.S. Bank"), by and through its
25 attorney, ROCK K. JUNG, ESQ., of the law firm of Wright, Finlay & Zak, LLP, and Defendant,
26 Flying Frog Avenue Trust (hereinafter "Flying Frog" or "Defendant"), by and through its
27 counsel of record, Michael F. Bohn, Esq. and Adam R. Trippiedi, Esq. of the Law Offices of
28 Michael F. Bohn, Esq., Ltd., and Defendant Red Rock Financial Services, LLC (hereinafter

1 “RRFS”), by and through its counsel of record, Steve Scow, Esq. of Koch & Scow, LLC, and
2 hereby stipulate and agree as follows:

3 WHEREAS on November 7, 2017, Plaintiff filed its First Amended Complaint against
4 Defendants seeking quiet title and declaratory relief concerning the real property located at 8970
5 Flying Frog Avenue, Las Vegas, Nevada 89148, purportedly sold at a non-judicial foreclosure
6 sale on February 4, 2013, to Defendant in satisfaction the HOA’s lien for unpaid assessments.

7 WHEREAS on November 17, 2017, RRFS filed a Motion to Dismiss [ECF No. 19].

8 WHEREAS the deadline for Plaintiff to file a response to RRFS’s Motion to Dismiss is
9 currently set for December 1, 2017.

10 WHEREAS on November 22, 2017, FLYING FROG filed a Motion to Dismiss [ECF No.
11 21].

12 WHEREAS the deadline for Plaintiff to file a response to FLYING FROG’s Motion to
13 Dismiss is currently set for December 6, 2017.

14 WHEREFORE, based on the foregoing, IT IS HEREBY STIPULATED AND AGREED
15 that the deadline for Plaintiff to file a response to RRFS’s Motion to Dismiss should be extended
16 to December 22, 2017.

17 IT IS FURTHER STIPULATED AND AGREED that the deadline for Plaintiff to file a
18 response to FROG’s Motion to Dismiss should be extended to December 22, 2017.

19 DATED this 30th day of November, 2017.

20 **WRIGHT, FINLAY & ZAK, LLP**

**LAW OFFICES OF MICHAEL F. BOHN, ESQ.,
LTD.**

21 /s/ Rock K. Jung, Esq.

/s/ Michael F. Bohn, Esq.

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28 Title Trust, U.S. Bank National Association,
as Legal Title Trustee

Flying Frog Avenue Trust

1 KOCH & SCOW LLC

2 /s/ Steve B. Scow, Esq.

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6 11500 South Eastern Avenue, Suite 210

7 Henderson, NV 89052

8 *Attorneys for Defendant,*

9 *Red Rock Financial Services*

10 **ORDER**

11 **IT IS SO ORDERED.**

12 
UNITED STATES DISTRICT JUDGE

13 December 1, 2017

14 DATED: _____